

July 12, 2024

VIA ECF

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The Honorable Peggy Kuo, Magistrate Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Securities & Exchange Commission v. Page, et al.*, 21 CV 5292 (ARR) (PK)

Letter-Motion for Extension of Time for Trevor Page's Response to the SEC's
Complaint

Dear Judge Kuo:

Pursuant to Local Rule 7.1(d), Defendant Trevor Page respectfully submits this letter-motion for an extension of time for his answer to the Securities & Exchange Commission's (SEC's) Complaint in the above-captioned matter. As brief procedural background, Mr. Page accepted service of the SEC's Complaint and the summons was returned executed on January 23, 2024 (ECF No. 70). Originally, Mr. Page's deadline for responding to the SEC's Complaint was February 23, 2024. This Court granted two extensions, to April 13, 2024 and July 12, 2024 (ECF Nos. 74 and 85). Mr. Page now requests an additional extension of his time to answer, move, or otherwise respond to the SEC's Complaint (ECF No. 1) from July 12, 2024 to September 12, 2024, for which there is good cause.

Good cause exists for the requested extension because the allegations in the Complaint overlap with the criminal charges Defendant Trevor Page is facing in *United States v. Trevor Page*, 21-CR-517 (KAM). Defendant Trevor Page has waived extradition from the United Kingdom in the *United States v. Trevor Page* case and appeared in the United States on May 21, 2024 (*United States v. Trevor Page*, 21-CR-517 (KAM), ECF No. 12). An extension of Defendant Page's time to respond to the SEC's Complaint will allow for coordination between this case and the related criminal case. Further, Defendant Page and his counsel need additional time to investigate the Complaint and finalize a response to it. The requested extension will not affect any of the other dates set in the case.

Counsel for Mr. Page spoke with the SEC on July 12, 2024, and the SEC does not object to Mr. Page's extension request.

Respectfully submitted,

/s/ Roger A. Burlingame
Roger A. Burlingame

cc: Senior Trial Counsel, Kathleen Shields, Esq.
Trial Attorney, Alexandra Lavin, Esq.